

United States District Court

JAN 22 2018

SOUTHERN

DISTRICT OF

TEXAS

MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Jorge Alejandro Goyre

PRINCIPAL

Case Number:

YOB: 1978

M-18-0146-M

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 20, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Saul Humberto Lobo-Bendeck and Oscar Edgardo Lobo-Barahona, both citizens of Honduras, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near San Juan, Texas to the point of arrest near Donna, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

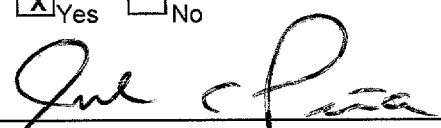
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On January 20, 2018, camera operators observed several suspected undocumented aliens running east on the levee from an area known as Brewster Lane in San Juan, Texas. This agriculture area is a well-known pick up location for illegal aliens and is approximately 1 mile north of the Rio Grande River.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No


Signature of Complainant


Approved Joseph Leonard
Sworn to before me and subscribed in my presence,

Julio C. Peña Senior Patrol Agent
Printed Name of Complainant

January 22, 2018
Date

at McAllen, Texas
City and State

Peter E. Ormsby U. S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18- 0146 -M

RE: Jorge Alejandro Goyre

CONTINUATION:

Border Patrol Agents, traveling west on Highway 281, responded and observed a grey pickup truck stationary near a farm field as they approached the area. The pickup truck was just east of where the camera operator last observed the suspected aliens running.

Agents approached the pickup truck and attempted to conduct a vehicle stop by activating their emergency lights, however the pickup truck sped off. As the pickup truck accelerated north on the field road, he struck an agent that was parked on the same field road with his emergency lights activated. The pickup truck continued to travel towards Military Highway 281 as additional agents responded to the area in an attempt to stop the pickup truck.

The driver of the pickup truck failed to yield to the agents' emergency lights and proceeded to travel approximately 15 miles before coming to a stop near the Frontage of Highway 83 in Donna, Texas. At this time, agents witnessed the driver exit the pickup, along with several subjects, and run in an attempt to abscond. The driver, later identified as Jorge Alejandro Goyre, a United States Citizen, was pursued by agents and eventually caught approximately 75 yards away from the pickup truck. With the help of additional agents, a total of three subjects were apprehended near the area. Saul Humberto Lobo-Bendeck, Oscar Edgardo Lobo-Barahona, and the third subject were determined to being illegally present in the United States.

All subjects were transported to the Weslaco Border Patrol Station to be processed accordingly.

PRINCIPAL STATEMENT:

Jorge Alejandro Goyre was read his Miranda Rights. He understood his rights, however he refused to provide a sworn statement without the presence of an attorney.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18- 0146 -M

RE: Jorge Alejandro Goyre

CONTINUATION:

MATERIAL WITNESSES' STATEMENTS:

Saul Humberto Lobo-Bendeck and Oscar Edgardo Lobo-Barahona were read their Miranda Rights. Both understood their rights and provided a statement without the presence of an attorney.

Lobo-Bendeck, a citizen of Honduras, stated his family made the smuggling arrangements and was to pay \$1,000 USD. After crossing the river, Lobo-Bendeck claims the rafter instructed them to run north and a truck would be waiting for them. Lobo-Bendeck indicated a gray truck was there at the pickup location and the driver instructed them to get in. Once they took off, Lobo-Bendeck stated the driver hit a patrol unit and said "ya me chingaron". Lobo-Bendeck identified Jorge Alejandro Goyre, through a photo lineup, as the driver of the pickup truck.

Lobo-Barahona, a citizen of Honduras, stated he made the smuggling arrangements and was to pay \$1,000 USD. After crossing the river, Lobo-Barahona stated a man guided them to a levee and pointed to the truck that was going to pick them up. Lobo-Barahona claims the driver of the truck yelled "come to the front, hurry up" as he approached them. Once inside the truck, Lopez-Barahona stated the driver hit a patrol unit but continued driving fast. Lopez-Barahona identified Jorge Alejandro Goyre, through a photo lineup, as the driver of the pickup truck.